

Burke, NadiaHollan

From: Burke, NadiaHollan
 Sent: Tuesday, May 23, 2017 7:52 AM
 To: 'Olp, Kevin@EPA'; juanita.bacey@dtsc.ca.gov
 Subject: RE: Question from Bayview Hunters Point IVAN Meeting
 Attachments: Superfund Site Assessment EPA Webpage TI.pdf

Hello, I also consulted with our site assessment staff that works on the NPL listing process. They explained to me that Treasure Island did score high enough for NPL listing but that they made a determination that the site qualified for "Other Cleanup Activity" Status and NPL listing was not pursued. That means that cleanup will be done by another party, and EPA will have a minimal role. NPL listing is not an automatic outcome.

Attached is a printout from EPA's webpage about the listing process from the link below with a markup hi-lighting the steps that our site assessment program took to evaluate Treasure Island. The website also includes information about how Federal Facilities are handled.

<https://www.epa.gov/superfund/superfund-site-assessment-process>

The official definition of the Other Cleanup Activity status according to our Superfund Program Implementation Manual is:

Other Cleanup Activity (OCA)

Activity Definition:

This activity is used to document the referral of a non-NPL site to a state, tribal, or federal environmental cleanup program for remedial-type work without EPA enforcement or oversight. Remedial-type work can include comprehensive site investigations in support of making cleanup determinations, interim cleanup actions, removals or final cleanup decisions, including decisions that cleanup is not required. For this definition, 'without EPA enforcement or oversight' means that there is no continuous and substantive involvement on the part of EPA while remedial-type work is ongoing, such as routinely reviewing work products and other documents and providing comments to the non-EPA party. However, EPA may gather information about activities at an Other Cleanup Activity (OCA) site through meetings or calls with the non-EPA party, by accessing related web sites, or through other means.

OCA status should only be used for sites that have completed a PA within the Superfund site assessment process and are considered to be NPL-caliber (i.e., existing information indicates that the site may achieve an HRS score > 28.5) and the site warrants remedial-type work as described above.

Regions should annually discuss progress of OCA sites with the other party leading or managing the remedial-type work to ensure adequate progress is being made. OCA sites not making adequate progress should be evaluated to determine whether another cleanup approach is warranted.

Nadia Hollan Burke, Environmental Engineer
 Remedial Project Manager (Superfund)
 U.S. Environmental Protection Agency, Region IX
 75 Hawthorne St. (SFD-8-1)
 San Francisco, CA 94105
 Phone: 415-972-3187 Fax: 415-947-3511
 E-mail: Burke.NadiaHollan@epa.gov

From: Olp, Kevin@EPA [<mailto:Kevin.Olp@calepa.ca.gov>]
Sent: Monday, May 22, 2017 5:28 PM
To: juanita.bacey@dtsc.ca.gov
Cc: Burke, NadiaHollan <Burke.NadiaHollan@epa.gov>
Subject: RE: Question from Bayview Hunters Point IVAN Meeting

Perfect, thanks Juanita that's very helpful. Thanks again for your help here!

From: Bacey, Juanita@DTSC [<mailto:Juanita.Bacey@dtsc.ca.gov>]
Sent: Monday, May 22, 2017 11:13 AM
To: Olp, Kevin@EPA <Kevin.Olp@calepa.ca.gov>
Cc: Burke.NadiaHollan@epa.gov
Subject: RE: Question from Bayview Hunters Point IVAN Meeting

Hi Kevin,

From what I heard, there is an EPA scoring process to determine what goes on the NPL list and many years ago when it was evaluated, it didn't score high enough. However, I believe the scoring process has been updated since then. But we are more than halfway done with the cleanup now.

Nina

From: Olp, Kevin@EPA [<mailto:Kevin.Olp@calepa.ca.gov>]
Sent: Friday, May 19, 2017 5:05 PM
To: Bacey, Juanita@DTSC <Juanita.Bacey@dtsc.ca.gov>
Cc: Burke.NadiaHollan@epa.gov
Subject: RE: Question from Bayview Hunters Point IVAN Meeting

So this is helpful, but I realized as I was summarizing a response that I'm clear on who the lead agency for the cleanup is, but not why it's not on the NPL list. Can you just walk me through how those designations happen so I can get to the heart of the question? If it's easier we can have a quick phone call next week.

From: Olp, Kevin@EPA
Sent: Thursday, May 18, 2017 4:38 PM
To: 'Bacey, Juanita@DTSC' <Juanita.Bacey@dtsc.ca.gov>
Cc: Burke.NadiaHollan@epa.gov
Subject: RE: Question from Bayview Hunters Point IVAN Meeting

Thanks so much! I forwarded this to the person who requested this information and they said this is what they were looking for. Thanks so much for your help!

Kevin

From: Bacey, Juanita@DTSC [<mailto:Juanita.Bacey@dtsc.ca.gov>]
Sent: Thursday, May 18, 2017 2:04 PM
To: Olp, Kevin@EPA <Kevin.Olp@calepa.ca.gov>
Cc: Burke.NadiaHollan@epa.gov
Subject: RE: Question from Bayview Hunters Point IVAN Meeting

Hi Kevin,

As Lily Lee with the EPA indicated in her recent email, I am the project manager with DTSC assigned to the treasure island project. If you saw the chain of emails from Lily, you saw Nadia's (EPA proj. mgr) response to your question.

Although TI is not on the NPL, it is still treated like a Superfund site in that it is going through the same stringent cleanup requirements (Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) known as "Superfund"). The Navy is required to cleanup following CERCLA just as the Hunters Point site is. However, because

Hunters Point is on the NPL list, the U.S. EPA is the lead regulatory agency overseeing the cleanup, along with DTSC and the Water Board. On TI, DTSC is the lead regulatory agency, along with the Water Board. The U.S. EPA has a minor role. The fact that it's not on the NPL list does not affect the cleanup standards.

I have received a call from a community member, as did Nadia, on your question. But it seems no matter how many times we answer it, we still get this question. Feel free to contact me if you have any other questions.

Nina Bacey, Project Manager
Sr. Environmental Scientist
Brownfields & Environmental Restoration
CalEPA – CA Dept. of Toxic Substances Control
700 Heinz Ave, Berkeley, CA 94710
(510) 540 - 2480

Superfund Site Assessment Process

Superfund Site Assessment Process

Pre-CERCLIS Screening

Cleanup Alternatives

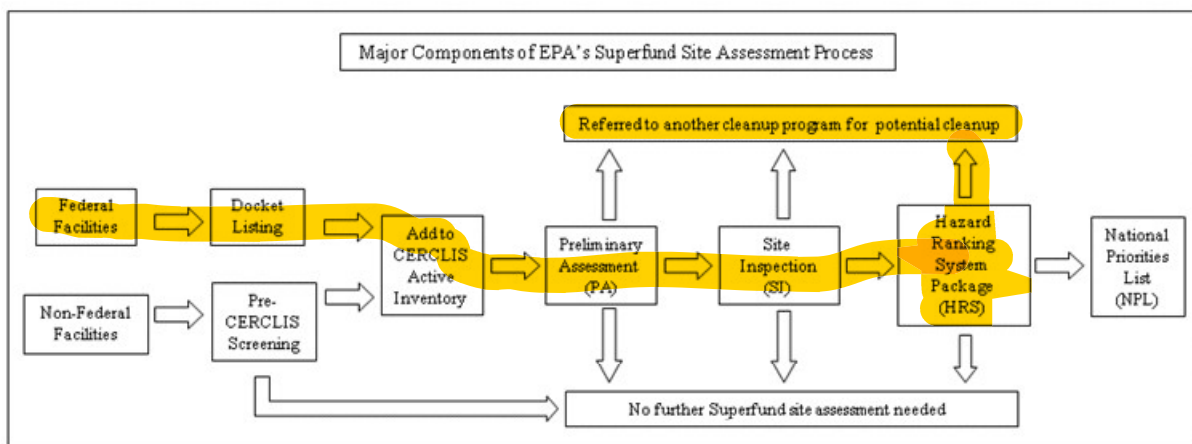
State, Tribal and Other Federal Agency Cleanups

Site Assessment Training and Guidance

HRS Quickscore

The Superfund site assessment process evaluates potential or confirmed releases of hazardous substances that may pose a threat to human health or the environment. Hazard Ranking System (HRS) criteria guide the process, which is carried out by EPA, state, tribal or other federal agency environmental programs. After identification of a site, a series of assessments evaluate the potential need for remedial cleanup. This diagram illustrates the major parts of the site assessment process.

Click diagram to expand



Major Components of EPA's Superfund Site Assessment Process

About Superfund site assessments

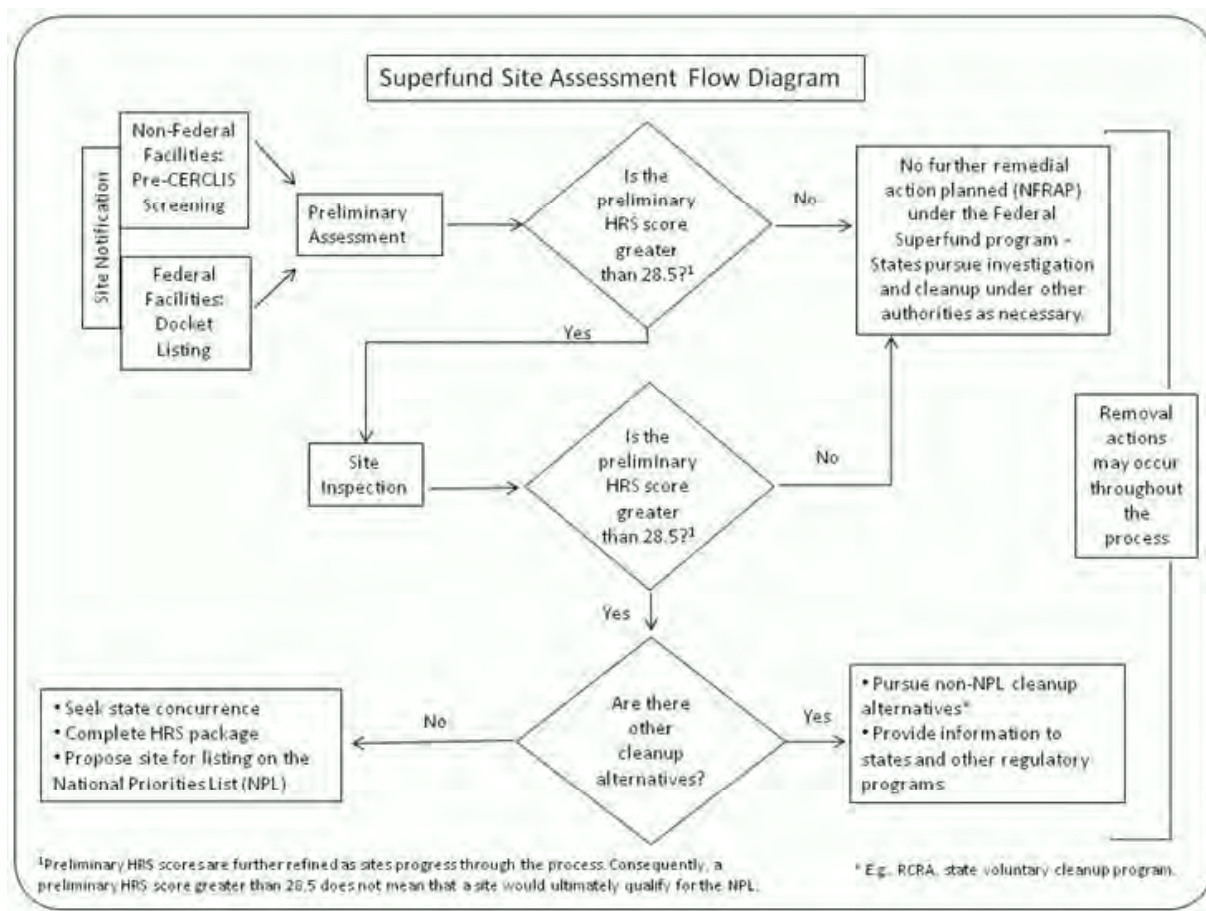
Special Project

Assessment of historic lead smelters.

- [Strategy for Addressing 464 Lead Smelter Sites \(PDF\)](#) (32 pp, 1.12 MB, [About PDF](#))

Superfund site assessments evaluate site conditions to identify appropriate responses to releases of hazardous substances to the environment. During this process, EPA, states, tribes and other federal government environmental programs collect data to identify, evaluate and rank hazardous waste sites based on HRS criteria. The HRS is a numerically based screening system that uses information from initial limited investigations to assess the relative potential of sites to pose a threat to human health or the environment. It is the principal mechanism EPA uses to place uncontrolled waste sites on the National Priorities List (NPL). Sites with HRS scores of 28.5 or greater are eligible for placement on the NPL. Only sites on the NPL are eligible for Superfund Trust Fund-financed remedial actions. This diagram shows how sites move through the Superfund site assessment process:

Click to expand diagram



Superfund Site Assessment Flow Diagram

The Superfund site assessment process begins with site discovery or notification of a release or potential release into the environment. EPA may be notified of hazardous waste activity by citizens, states, tribes or other environmental programs. At federal facilities, the process starts with a facility's listing on the Federal Agency Hazardous Waste Compliance Docket (Docket).

Following notification, non-federal sites undergo pre-screening to determine whether the Superfund site assessment process is appropriate. Federal facilities bypass this step; each facility placed on the Docket undergoes a preliminary assessment. Sites identified as appropriate for the site assessment process receive a site discovery date and are added to EPA's active CERCLIS site inventory. Using HRS criteria, EPA, its state and tribal partners, or the appropriate federal department or agency then conduct a preliminary assessment and, if warranted, a site inspection or other more in-depth assessment. These efforts determine whether a site warrants short-term or long-term cleanup attention. Sites that do not need further attention receive a No Further Remedial Action Planned (NFRAP) designation. Sites requiring further study are referred to appropriate cleanup programs. These programs include EPA's Emergency Response and Removal program, EPA's Resource Conservation and Recovery Act (RCRA) Corrective Action program, state and tribal cleanup initiatives such as voluntary cleanup programs (VCPs), the Superfund Alternative Approach (SAA), and the NPL.

At the conclusion of each assessment, the HRS model is applied to derive a preliminary site HRS score. Sites with preliminary HRS scores below 28.5 generally require no further Superfund remedial interest and are assigned a NFRAP decision. The NFRAP decision can also be made at sites with preliminary HRS scores of 28.5 or higher if EPA determines the site would receive a "no action" Record of Decision (ROD) if placed on the NPL. Most sites assessed for potential NPL listing screen out of the program.